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**USWEST**

Elridge A. Stafford  
Executive Director-  
Federal Regulatory

**EX PARTE**

December 16, 1997

**RECEIVED**

**DEC 16 1997**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222, SC-1170  
Washington, DC 20554

RE: Customer Proprietary Network Information, CC Docket No. 96-115

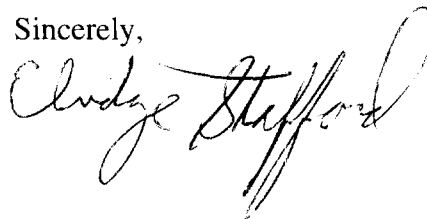
Dear Ms. Salas:

Representatives of U S WEST met today via telephone with Dorothy Attwood, Tonya Rutherford, Daniel Shiman, and Lisa Choi of the Policy and Program Planning Division. U S WEST was represented by Kathryn Krause, B. J. Deering, Ivy Stevens, Debra Adams and the undersigned. The attached material was used as the basis for discussion during this call.

In accordance with Section 1.1206(a)(2) of the Commission's Rules, the original and one copy of this letter, with attachment, are being filed with your office for inclusion in the public record for the above-mentioned proceeding. Acknowledgment of date of receipt of this transmittal is requested. A duplicate of this letter is provided for this purpose.

Please contact me if you have any questions.

Sincerely,



Attachment

cc: Ms. Dorothy Attwood  
Ms. Lisa Choi  
Ms. Tonya Rutherford  
Mr. Daniel Shiman

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# **Customer Response to CPNI Solicitation-- Trial Findings**

CC Docket No. 96-115

**U S WEST**

B.J. Deering, Market Intelligence and Decision Support

Ivy Stevens, Markets Regulatory Strategy

Kathy Krause, Senior Attorney

Elridge Stafford, Federal Regulatory

Debra Adams, Markets Regulatory



## **Engagement With The Customer Is The Most Important Underpinning For Affirmative Response**

- Affirmative responses were highest when the direct impact on the customer's immediate interest was apparent and the customer was engaged in discussion of telecommunications services, e.g., on inbound calls, when the value of being able to reference the record is obvious.
  - Inbound calling approach produced fairly high levels of affirmative consents (72%).
    - Compare Ameritech trial - 91% affirmative approval (Ameritech Ex Parte, CC Docket 96-115, October 6, 1997).
- Inbound approach reaches only 15% of U S WEST customer base. Achieving the same level of engagement with the other 85% of the customer base is improbable, if not impossible:
  - Company-initiated contact encountered disengagement.
  - When customers were requested to take initiative, they did not.
  - A fairly wide range of incentives did not create interest in the topic.
  - Flat response across options and customer types and segments.
    - Atypical of marketing promotions and indicative of lack of engagement.



## **U S WEST Trial Confirms Other Findings On Privacy And Internal Use Of CPNI**

- Internal use of CPNI raises minimal, if any, privacy concerns
  - The public's concern about personal privacy is increasing -- 89% in 1996 -- an 8.5% rise within one year. (Westin survey questions #14, 15)
  - Despite the fact they are concerned about personal privacy, they consider it acceptable for telephone companies to look at and use their records (64%). (Survey question #11)
  - The acceptable rating for the telephone company's use of its customer information increases to around 80% once the customer has an opportunity for opt-out. (Survey question #12)
  - These findings are not surprising, given the high level of trust the public has in the telephone company. (Survey question #2, 2c)

Reference: Public Attitudes Toward Local Telephone Company Use of CPNI, Opinion Research Corporation and Prof. Alan F. Westin, November 14-17, 1996.

## **Conclusion**

- Engagement with the customer is the most important underpinning of affirmative response.
- Disengagement occurs when both the message and medium are out of context and deemed intrusive.
- An opt-out approach for CPNI approval is appropriate, given the public's trust of the telephone company and the public's acceptance for telephone companies to look at and use their records.
- Customers do not have a privacy concern when a carrier's use of its customer records supports the relationship.